



Kathy D. Patrick Partner kpatrick@gibbsbruns.com 713.751.5253

February 21, 2020

Via CM/ECF

Special Master Thomas P. Scrivo, Esq. O'Toole Scrivo, LLC 14 Village Park Road Cedar Grove, New Jersey 07009 tscrivo@oslaw.com

Re: Occidental Chemical Corp. v. 21st Century Fox Am., Inc., et al., Civil Action No. 2:18-cv-11273-MCA-JAD

Dear Special Master Scrivo:

Per the February 18, 2020 Order of the Special Master Regarding Electronically Stored Information, enclosed is Plaintiff Occidental Chemical Corporation's (OxyChem) Motion to Clarify the Scope of Discovery (the "Chemical List Motion"). In accordance with the Court's direction during the August 27, 2019 Status Conference before Magistrate Judge Dickson, OxyChem has designated its Motion on the Court's CM/ECF system as a letter application. *See* Aug. 27, 2020 Tr. at 24, 61.

Thank you for your consideration of this matter.

Respectfully submitted,

Kathy D. Patrick

/s/ John J. McDermott

John J. McDermott

Enclosures

cc: All counsel of record